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June 7, 2024

Filed ECF
Hon. Valerie Figueredo
United States District Court
500 Pearl Street
New York, NY 10007

RE: Cruz v. O'Malley
24-cv-0823 (JPO)(VF)

Dear Judge Figueredo:

I am writing to request a one-week extension of time to file plaintiff's Motion for Judgment on the Pleadings and Memorandum of Law in Support thereof. Plaintiff's papers are due to be filed today. This is plaintiff's second request for an extension of time.

I regret seeking an extension on the same day as the brief is due. I had hoped to be able to complete this brief by today, but several unexpected events have transpired over the past week that have significantly limited my ability to complete my work. My elderly mother was discharged from rehabilitation last month and last weekend, she once again fell, which has required me to spend more time than expected with her unscheduled appointments. In consultation with opposing counsel, SAUSA Candace Brown Casey, I respectfully request that the Court approve of the following revised schedule:

June 14, 2024	Plaintiff's Motion for Judgment on the Pleadings
August 13, 2024	Defendant's Opposition/Cross-Motion
August 27, 2024	Plaintiff's Reply

Thank you for your Your Honor's attention to this matter.

cc: Candace Brown Casey, Esq.
Attorney for Defendant

Very truly yours,

/s/ Christopher J. Bowes, Esq.
Christopher J. Bowes, Esq.

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

DATED: June 10, 2024

The extensions requested herein is granted. The deadline for Plaintiff's Motion is now June 14, 2024. The deadline for Defendant's Opposition is now August 13, 2024. The deadline for Plaintiff's Reply is now August 27, 2024. The Clerk of Court is respectfully directed to terminate the Motion at ECF No. 11.